

**DOCKET NO.: WWM-CV15-6009136-S**

**MELANIE PEREZ : SUPERIOR COURT**

**VS. : JUDICIAL DISTRICT OF  
WINDHAM AT PUTNAM**

**STATE OF CONNECTICUT,  
JUDICIAL DEPARTMENT : September 11, 2015**

**DEFENDANT'S OBJECTIONS TO PLAINTIFF'S FIRST SET OF INTERROGATORIES  
AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

Defendant State of Connecticut Judicial Department hereby objects to  
Interrogatory Nos. 6, 7 and 8 and Requests for Production Nos. 8, 9, 11, 13, 15, 18, 21  
and 22 as follows:

**INTERROGATORIES**

6. Please identify each person whom Defendant anticipates calling as a  
witness at trial of this matter, and for each such witness please identify in summary  
fashion the subject matter of each said witnesses' testimony.

**ANSWER:**

**OBJECTION:** The interrogatory is premature. The defendant will identify its  
witnesses prior to any trial in this matter, if necessary.

7. Identify each and every person the Defendant intends to call as an expert  
witness at trial and for each person so identified, state the following:

(a) state the subject matter on which the expert is expected to testify;

(b) state the substance of the facts and opinions to which the expert is expected to testify; and

(c) state a summary of the grounds for each opinion.

**ANSWER:**

**OBJECTION:** The interrogatory is premature and will be disclosed at the appropriate time in conformity with any Scheduling Order entered in this matter. No Scheduling Order has been entered. Notwithstanding the objection, the defendant has not determined if it will use an expert in the instant matter.

8. For each expert identified above in Interrogatory No. 7 above, state whether that expert has prepared a report of his/her findings.

**ANSWER:**

See. Response to Interrogatory No. 7.

**DOCUMENT REQUESTS**

8. Please produce all documents not produced in response to the foregoing production requests that in any way refer, relate, or concern Plaintiff.

**OBJECTION:** The request is overbroad, confusing, not narrow in scope and incomprehensible as written.

9. All communications concerning the factual allegations or claims at issue in this lawsuit among or between (a) Plaintiff and Defendant; (b) Plaintiff's

manager(s) and/or supervisor(s), and or Defendant's human resources representative(s).

**OBJECTION:** The request is overbroad, not narrow in scope in that there are no beginning and end dates and overly burdensome and not calculated to lead to admissible evidence for use at trial.

11. Please produce all documents concerning the formation and termination, if any, of the employment relationship at issue in this lawsuit, irrespective of the relevant time period.

**OBJECTION:** The request is overbroad, not narrow in scope in that there are no beginning and end dates and overly burdensome and not calculated to lead to admissible evidence for use at trial.

13. Please produce all documents relied upon to make the decision to deny Plaintiff's requests for accommodation.

**Objection:** Defendant did not deny the plaintiff's requests for accommodations.

15. Please produce all agreements between Plaintiff and Defendant to waive jury trial rights or to arbitrate disputes.

**OBJECTION:** The request is confusing and defendant is uncertain exactly what the plaintiff is seeking here. Further, this is requesting documents that may be protected by attorney work product doctrine.

18. Please produce all documents relied upon by Defendant to support Defendant's defenses, affirmative defenses, and/or counterclaims.

**Objection.** This is overly broad and requests documents that may be

protected by the attorney-client privilege.

21. Please produce all non-privileged documents concerning, evidencing, or relating to the complaints identified in response to Interrogatory No. 10.

**Objection.** This request is overly broad and unduly burdensome. See attached index.

22. Please produce all documents concerning Defendant's decision to deny Plaintiff's requests for accommodation.

**Objection.** Defendant did not deny the plaintiff's requests for accommodations.

DEFENDANT,  
JUDICIAL BRANCH

By: /s/ Josephine S. Graff  
Josephine S. Graff  
Assistant Attorney General  
55 Elm Street, P.O. Box 120  
Hartford, CT 06141-0120  
Tel: (860) 808-5340  
Fax: (860) 808-5383  
E-mail: [Josephine.Graff@ct.gov](mailto:Josephine.Graff@ct.gov)  
Juris No. 428723

**CERTIFICATION**

I hereby certify that a copy of the foregoing Defendant's Objections to Plaintiff's Responses to Plaintiff's First Set of Interrogatories and Requests for Production of Documents was sent by first class mail to the following counsel of record on this 11<sup>th</sup> day of September, 2015:

Magdalena B. Wiktor  
Madsen, Prestley & Parenteau, LLC  
105 Huntington Street  
New London, CT 06320  
Tel: (860) 442-2466  
Fax: (860) 447-9206

/s/ Josephine S. Graff  
Josephine S. Graff  
Assistant Attorney General